

1 RENE L. VALLADARES
Federal Public Defender
2 State Bar No. 11479
BENJAMIN F. J. NEMEC
3 Assistant Federal Public Defender
411 E. Bonneville, Ste. 250
4 Las Vegas, Nevada 89101
(702) 388-6577/Phone
5 (702) 388-6261/Fax
6 Ben_Nemec@fd.org

7 Attorney for Pedro Jesus Naranjo

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11

12 Plaintiff,

13 v.

14 PEDRO JESUS NARANJO,
15

Defendant.

Case No. 2:19-cr-00203-GMN-EJY-1

**STIPULATION TO CONTINUE
REVOCATION HEARING**
(First Request)

16
17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
18 United States Attorney, and Kimberly M. Frayn, Assistant United States Attorney, counsel for
19 the United States of America, and Rene L. Valladares, Federal Public Defender, and Benjamin
20 F. J. Nemec, Assistant Federal Public Defender, counsel for Pedro Jesus Naranjo, that the
21 Revocation Hearing currently scheduled on November 18, 2024, be vacated and continued to a
22 date and time convenient to the Court, but no sooner than thirty (30) days.

23 This Stipulation is entered into for the following reasons:

24 1. Defense counsel needs additional time to conduct investigation and review
25 discovery. Particularly, defense counsel needs to work with the Clark County Public
26 Defender's Office to gather information about Mr. Naranjo's state cases.

2. Government counsel is unavailable November 26, 2024 to December 2, 2024 and December 23, 2024 to January 2, 2024.

3. The defendant is in custody and agrees with the need for the continuance.

4. The parties agree to the continuance.

This is the first request for a continuance of the revocation hearing.

DATED this 15th day of November, 2024.

RENE L. VALLADARES
Federal Public Defender

JASON M. FRIERSON
United States Attorney

By /s/ Benjamin F. J. Nemec

By /s/ Kimberly M. Frayn

BENJAMIN F. J. NEMEC
Assistant Federal Public Defender

KIMBERLY M. FRAYN
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 PEDRO JESUS NARANJO,

7 Defendant.
8

Case No. 2:19-cr-00203-GMN-EJY-1

ORDER

9
10 IT IS THEREFORE ORDERED that the revocation hearing currently scheduled for
11 Monday, November 18, 2024 at 9:00 a.m., be vacated and continued to December 18, 2024 at
12 the hour of 10:00 a.m.

13 DATED this 15 day of November, 2024.

14
15 
16 UNITED STATES DISTRICT JUDGE
17
18
19
20
21
22
23
24
25
26